

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

BARBARA ANNE ANDERSON,)
)
Plaintiff,)
)
vs.)
)
ALFA LAVAL, INC. et al.)
)
Defendants.)

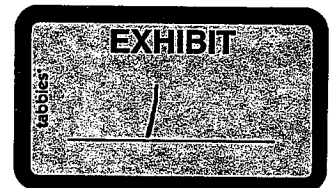
CAUSE NO. 760CL06006790-00

**PLAINTIFF'S RESPONSE TO GENERAL ELECTRIC COMPANY'S
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 4:8 and 4:9 of the Rules of The Supreme Court of Virginia, Plaintiff, Barbara Anne Anderson, by and through her counsel, responds to the following Interrogatories and Requests for Production of Documents as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to this discovery request to the extent it is vague, overly broad, unduly burdensome, seeks discovery of matters, things, or information not relevant or material to the subject matter in the pending action and not reasonably calculated to lead to the discovery of admissible evidence.
2. Plaintiff objects to this discovery request to the extent it seeks discovery of information protected from disclosure by the work-product rule, as well as discovery of confidential communications made for the purpose of facilitating the rendition of professional legal services, all of which are protected from discovery by the attorney-client privilege under to the Rules of the Supreme Court of Virginia.
3. Plaintiff objects to this discovery request insofar as it seeks information equally accessible to both Plaintiff and Defendants.



Clarence Thomas Arehart
Married in 1959
Divorced in 1977

- c. Plaintiff reserves the right to supplement her Answer to this request at a later date and in response provides the following.

Andrew Todd Arehart, son from first marriage
109 A. North Thalia Road
Virginia Beach, Virginia 23452
DOB: February 27, 1960

Kym Alexander Arehart, daughter from first marriage
1169 Tree Fern Drive
Virginia Beach, Virginia 23451
DOB: May 19, 1961

- d. Plaintiff reserves the right to Answer this request at a later date.

INTERROGATORY NO. 3: Have you ever been a member of the armed forces of the United States? If so, state the following:

- a. serial number;
- b. branch of service;
- c. date of service, including date(s) and type(s) of discharge(s);
- d. whether you received any injury during your service career whether you claimed disability for any illness, injury or other physical condition arising out of your military service, and if so, the details thereof including the date on which the claim was made, the nature of the claim, the treatment received for such illness or injury, the claimed disability and the disability rating, if any, which was given, and compensation received for such;
- f. whether you worked with or around any asbestos-containing products during your service career and the date(s) and location(s) of such work.

ANSWER:

Plaintiff was never a member of the armed forces of the United States.

INTERROGATORY NO. 4: Describe in detail your employment history. Please include for each employer:

- a. Name and address of each employer;
- b. The dates of each such employment;
- c. Each job function (e.g., pipecoverer, pipefitter, painter, etc.) and each job title (e.g., mechanic, foreman, supervisor, etc.) the you held while working thereon and describe, in full detail, for each such job function and title your duties and responsibilities with respect thereto, and the period of time at each;
- d. The wage rate, hours worked, and average weekly earnings regarding each employment;
- e. Identify the reason each employment was terminated;
- f. Identify, for each employment, whether you were exposed to asbestos;
- g. The type and identity of each asbestos-containing product or material which you used, worked around and/or were otherwise exposed to, including the trade name of each such product; the manufacturer of each such product; the distributor and/or supplier of each product; a detailed description of each such product (including the trade name, general name, product type, product content, color or description, and form); a detailed description of the containers or other packaging in which such product was packaged; the purposes for which you used each such product; the dates on which you came in contact with each such product; and as to each such product identified herein, whether you (i) worked directly with it on new installation, (ii) worked directly with it on rip-out or removal or (iii) worked around or were otherwise exposed to it.
- h. Whether you missed any time from work as a result of the injuries made the basis of this suit and, if so, the amount of lost time and/or lost earnings, if any;
- i. Identify your immediate supervisors and coworkers in each employment. With respect to these supervisors and coworkers, indicate which are personally acquainted with you and which of them can identify, by brand name, manufacturer, or both, asbestos-containing products that you personally worked with or that were used around you. Further, with respect to each such supervisor or co-worker, name the products and the manufacturers of the products so identified and the dates and locations where these products were so used;
- j. Identify all persons of whom you are aware (other than those identified in subsection (i), above), that have personal knowledge that you ever worked with or were exposed to any product manufactured by each defendant named in your Complaint. As to each witness, state the specific product by

trade name and/or manufacturer that he or she identifies and the place and years that you worked with or were exposed to each product.

- k. The name, address and telephone number of each individual responsible for making any purchase of any asbestos products for use on each such job site and the name and address of the employee(s) and/or department(s) of each employer having custody of any records relating to the purchase of any such products.

ANSWER:

DePaul Hospital
Granby Street
Norfolk, Virginia
X-Ray Technician
1957-1959

Owens-Illinois
Charleston, West Virginia
Factory Worker – Bottling Plant
1960-1961

Headquarters – 5th Naval Dist. USN
Norfolk, Virginia Naval Base
Telephone Operator
1962-1963

NAS Oceana USN
Virginia Beach, Virginia – Naval Air Station
Telephone Operator/Supply Clerk
1963-1967

Dam Neck Training
Virginia Beach, Virginia – Training Center USN
Accounts Maintenance Clerk
1967-1970

Public Health Hospital
Hampton Boulevard
Norfolk, Virginia
Voucher Examiner
1970-1974

Naval Air Station USN
Norfolk, Virginia
Accounting Tech
1974-1975

Human Resource Management Center - USN
Financial Office
Tidewater Drive
Norfolk, Virginia
Budget & Accounting Analyst
1975-1976

CINC - Atlantic USN
Account Branch
Norfolk, Virginia
Accounting Tech
1976

Naval Station USN
Staff - Civil Engineer Department
Norfolk, Virginia
Supervisory Budget Analyst
1976-1978

Atlantic Fleet Headquarters Support
Financial Office
Norfolk, Virginia
Budget & Accounting Analyst
1978-1980

Civil Service
Washington, DC
Accounting/Budget Analyst
1980-1985

Captains Quarters Resort Hotel
Virginia Beach, Virginia
General Manager
1985-2000

Plaintiff reserves the right to supplement her Answer to this request at a later date.

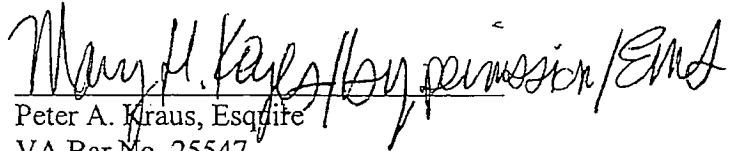
INTERROGATORY NO. 5: With respect to each asbestos-containing product and place of employment identified in response to Interrogatory No. 4, above, please provide the following:

- a. A detailed description of your work methods and procedures with respect to the asbestos products and/or materials you used, including but not limited to, the

RESPONSE:

Plaintiff is in the process of executing the requested Releases and Authorizations and will provide them to Defendant at her earliest convenience.

Respectfully submitted,


Peter A. Kraus, Esquire

VA Bar No. 25547

Mary H. Keyes, Esquire

Waters & Kraus

3219 McKinney Ave., Ste. 3000

Dallas, Texas 75204

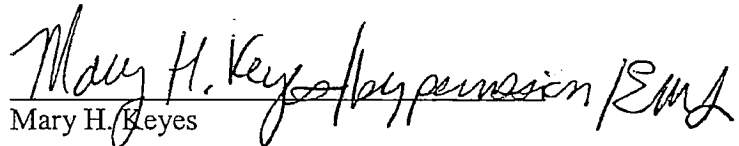
214-357-6244

214-357-7252 (Fax)

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on the 11th day of December 2006, a true and correct copy of the foregoing document was served by Plaintiff on all anticipated counsel of record.


Mary H. Keyes